

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

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MAIL PROCESSING NETWORK  
RATIONALIZATION SERVICE CHANGES, 2012

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Docket No. N2012-1

INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO  
TO USPS WITNESS EMILY ROSENBERG  
(APWU/USPS-T3-30)  
(February 27, 2012)

Pursuant to Rules 25 through 28 of the Rules of Practice, American Postal Workers Union, AFL-CIO, in order to obtain information needed for rebuttal testimony, directs the following interrogatories to United States Postal Service witness Rosenberg (USPS-T-3). If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer.

Instructions and Definitions applicable to these Interrogatories are contained in the Interrogatories of the American Postal Workers Union, AFL-CIO to the United States Postal Service witness David E. Williams (APWU/USPS-T1-1-4), filed on December 22, 2011, and are hereby incorporated by reference.

Respectfully submitted,

Darryl J. Anderson  
Jennifer L. Wood  
Counsel for American Postal Workers Union, AFL-CIO

APWU/USPS-T3-30. Please refer to USPS Library Reference N2012-1/13, tab 'ODIS'.

- a) Please confirm that the total First-Class Mail volumes reported in this tab by ZIP3 and volume category (L-INP, F-INP, etc.) exclude First-Class Presort mail pieces for which Origin ZIP Codes are unknown.
- b) If confirmed, please explain why this absence of Origin ZIP Codes justifies excluding the mail pieces from computations of total pieces for incoming sortation categories such as L-INP, L-INS1, L-INS2, F-INP, and F-INS.